

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Criminal No. 3:20-cr-187
	)	
vs.	)	<b>DEFENDANT'S MOTION TO</b>
	)	<b>CONTINUE</b>
LEONA YOKI WASHINGTON,	)	
	)	
Defendant.	)	

Comes now Leona Yoki Washington, by and through her attorney, Assistant Federal Public Defender Chad Pennington, and moves the Court for its Order extending the trial setting of June 29, 2021, as well as all related pretrial deadlines.

As grounds, Defendant states:

1. Defendant made her initial appearance on October 23, 2020 in the Western District of Washington, and was arraigned on December 1, 2020, on an Indictment, charging the Defendant with Conspiracy to Possess with Intent to Distribute and Distribute Controlled Substances and Tampering with a Witness, in violation of 21 U.S.C. § 846 and 18 U.S.C. §§ 1512(b)(3), 1512(i), and 2.
2. The Court entered its Criminal Pretrial Order and Jury Trial Notice on December 30, 2020, setting the jury trial for February 23, 2021. Defense counsel filed a motion to continue the trial on January 19, 2021, and the Court granted the motion. Trial is currently scheduled for June 29, 2021.
3. Defendant received discovery from the government on December 14, 2020.
4. Defense counsel needs additional time to properly investigate this matter and prepare for trial. Additional investigative work, based on a review of the discovery material, is

necessary before defense counsel can competently advise the Defendant if a plea agreement or trial is in his best interests.

5. Defense counsel has advised the Defendant of this motion, its purpose, and constitutional and statutory right to a speedy trial, pursuant to 18 U.S.C. § 3161 et seq. Defendant said she would consent to a continuance and has executed a written consent form, which is being filed contemporaneously with this motion.

6. Defendant is currently detained at Northwest Regional Correctional Center in Crookston, Minnesota.

7. The Government through Assistant United States Attorney Alexander Stock does not object to this motion.

8. The undersigned, further, represents to the Court that this motion is made neither for purposes of undue delay nor other improper reason. Counsel makes this request for the Defendant in order to have the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

WHEREFORE, Defendant Leona Yoki Washington, requests that the Court continue the trial setting to a time past June 29, 2021, and further, that all related pretrial deadlines be continued.

Dated this 18th day of May, 2021.

Respectfully submitted,

JASON J. TUPMAN  
Federal Public Defender  
By:

/s/ Chad Pennington  
Chad Pennington  
Assistant Federal Public Defender  
Attorney for Defendant  
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